

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHREN DIVISION**

DOUGLAS HANDSHOE	)	
	)	
	)	
v.	)	CIVIL ACTION NO. 1:15cv382-HSO-JCG
	)	
VAUGHN PERRET, CHARLES LEARY &	)	
DANIEL ABEL, D/B/A/ TROUT	)	
POINT LODGE LTD OF NOVA SCOTIA	)	
& IN THEIR INDIVIDUAL CAPACITIES	)	
PROGRESS MEDIA GROUP LIMITED,	)	
MARILYN SMULDERS, & ASHOKA	)	
	)	

**REPLY TO VAUGHN PERRET AND CHARLES LEARY’S RESPONSE IN  
OPPOSITION TO SLABBED NEW MEDIA L. L. C.’S MOTION TO INTERVENE**

Would-be Intervenor Slabbed New Media, L. L. C. (hereinafter Slabbed New Media) files this Reply to Vaughn Perret and Charles Leary’s Response in Opposition to Slabbed New Media’s Motion to Intervene. As explained in the accompanying memorandum, this Court should grant Slabbed New Media’ Motion to Intervene as the Motion is timely and asserts claims for Copyright Infringement that only Slabbed New Media has standing to bring before the Court. Any prejudice to the Defendants would be minimal due to the very early stage of the litigation. Additionally, the Defendants’ history and habit of filing retaliatory lawsuits against opposing counsel creates special circumstances that favor allowing Slabbed New Media to intervene.

The following exhibits are attached to this Reply:

1. Nova Scotia Civil Action styled Charles Leary, Vaughan (*sic*) Perret and Trout Point Lodge, Limited v Jack Etherton Truitt & Truitt Law Firm, LLC

Respectfully submitted this 10<sup>th</sup> day of March, 2017,

s/G. Gerald Cruthird

G. GERALD CRUTHIRD

Of Counsel for the Defendant Douglas Handshoe

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**CERTIFICATE OF SERVICE**

I, G. Gerald Cruthird, Attorney for Slabbed New Media, LLC, do hereby certify that I have this date electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk and via U. S. Mail upon any non-ECF participants at their address of record.

So certified, this 10<sup>th</sup> day of March, 2017,

/s/G. Gerald Cruthird

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